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October 30, 2022

VIA ECF

The Honorable Katharine H. Parker
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Robinson v. De Niro and Canal Productions, Inc.*, No. 1:19-cv-09156 (LJL) (KHP)

Dear Judge Parker:

This firm represents Plaintiff Graham Chase Robinson. This letter is submitted jointly on behalf of all parties.

Pursuant to the Court's Orders at Dkt. Nos. 270, 277, and 279, the parties will be submitting their respective motions for summary judgment by October 30, 2022, followed by opposition papers due by November 20, 2022, and reply papers due by December 11, 2022. In connection with summary judgment briefing, the parties anticipate filing extensive material that has been designated as confidential pursuant to the Stipulation and Protective Order in this case (Dkt. No. 23). This material includes memoranda of law and Rule 56.1 statements of material facts that quote documents that have been designated confidential, declarations that identify or discuss documents that have been designated confidential, and exhibits that are documents that have been designated confidential.

Accordingly, the parties respectfully request: (i) the Court accept for filing under seal – on a temporary basis – all documents submitted in connection with the parties' summary judgment briefing (other than notices of motion), (ii) following the deadline for reply briefing on December 11, 2022, the parties shall exchange their proposed redactions and shall meet-and-confer regarding same by December 21, 2022, and (iii) the parties shall submit a joint letter to the Court by January 12, 2023, pursuant to this Court's Individual Practices in Civil Cases III(d), setting forth their proposed redactions with respect to all of the summary judgment papers that have been filed.

This will promote efficiency. Rather than having the Court and the parties address redaction issues piecemeal while summary judgment briefing remains in progress, this approach will enable the parties to meet and confer to try to minimize any redaction requests and to present to the Court, in a single place, all their positions concerning the scope of, and basis for, redactions.

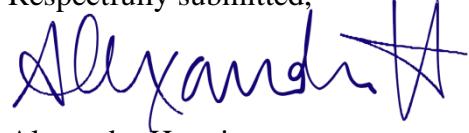
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We appreciate the Court's consideration of this matter.

Respectfully submitted,



Alexandra Harwin